



**VILLAGE OF  
MANCHESTER  
VERMONT**

January 14 ,2026

To: Via ePuc Filing  
Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05620

Cc: Town of Manchester  
Town Manager &  
Planning Commission  
40 Jeff Williams Way  
Manchester, VT 05255

Downs Rachlin & Martin  
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PO Box 190  
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From: Village of Manchester  
Planning Commission  
PO Box 482  
45 Union Street  
Manchester, VT 05254

Re: Case # 25-3009-PET  
Cingular Wireless PCS, LLC  
d/b/a AT&T  
for submission to the Vermont Public Utility Commission a petition for approval to construct the telecommunications facility AT&T near 3749 Main Street, Village of Manchester, VT 05254  
CRAN, MANVT-007

Dear Commissioners:

This letter, is sent by the Planning Commission of the Village of Manchester, Vermont ("Village"), and shall serve as notice to the Vermont Public Utility Commission ("PUC") pursuant to 30 V.S.A. § 248a(c)(2) regarding to Cingular Wireless PCS, LLC d/b/a AT&T petition to install a new telecommunications facility ("proposed Facility") near 3749 Main Street, Village of Manchester, VT 05254 ("proposed Site").

Village of Manchester formally opposes approval of the petition for the project described in the above-referenced docket, having determined that such proposed telecommunications facility does not comply with the Village of Manchester Plan of Development adopted in September 12, 2022 (the "Village Plan")<sup>1</sup> or with the Manchester Village Land Use & Development Regulations adopted September 8th, 2025 (the "Land Use Regulations")<sup>2</sup>.

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<sup>1</sup> <https://tinyurl.com/villagepod>

<sup>2</sup> <https://tinyurl.com/villagelur>

## I. INTRODUCTION

On September 17th, 2025, Petitioner Cingular Wireless PCS, LLC d/b/a AT&T (“Petitioner”) submitted its 60-Day Advance Notice to the Village of Manchester pursuant to 30 V.S.A. § 248a, of its intent to submit to the PUC a petition for approval for the proposed Facility. The petition describes the Facility consisting of the following:

- A. A new wooden utility pole (the “Pole”), having a maximum height of 34’ above ground level (“AGL”), replacing an existing pole within the public right of way along Main Street;
- B. Installation of one antenna, measuring approximately 24” x 16”, to be mounted at the top of the Pole at a centerline height of 36’-6” AGL;
- C. Installation of an equipment cabinet containing two (2) remote radio head units (“RRUs”) and other equipment on the Pole a centerline height of 10’-6” AGL; and
- D. Ancillary improvements and other appurtenances located near the base of the Pole (e.g. electrical meter and circuit breaker) to be used in connection with operation of the Facility, and rerouting of existing overhead utility lines to the Pole.

On November 5<sup>th</sup>, 2025, the Village of Manchester Planning Commission provided notice of its formal opposition to this proposal, including a summary of its primary concerns and rationale for opposition. On December 4, 2025, the Applicant filed a petition to construct the facility as described in its Advanced Notice from September 17th. We have found that the Applicant’s narrative:

1. Does not adequately address the Village’s concerns,
2. reflects no modifications or adjustments to its original plan that would allow its proposal to comply with the Village’s Plan of Development or Land Use and Development Regulations, and
3. includes several misleading and false statements that we have identified in our Recommendations detailed below.

## II. VILLAGE RECOMMENDATIONS

Based on a review of the proposal with respect to relevant provisions of the Village of Manchester Plan of Development and Land Use and Development Regulations, the Village Planning Commission has concluded that:

1. it does not comply with the Village Plan and Land Use Regulations,
2. would have an undue adverse impact on our historic and natural scenic resources, and
3. would not be in the public interest of the citizens of the Village.

Key findings of fact are outlined below:

- A. The proposed Facility includes material modifications to the existing light pole, including the addition of modern telecommunications equipment that would have an undue adverse visual impact on the scenic beauty, streetscape/viewscape, detract from the late 19<sup>th</sup> and early 20th century appearance of the surrounding area, and would not be in alignment with the following Goals enumerated in the Village Plan:

*“1. Maintain the small, rural, primarily residential late 19th and early 20th century appearance of the community, particularly as viewed from the Main Street (Route 7A, and all Village through streets.*

2. Every effort to preserve the unique and individual characteristics of the Village Core, including: Historic Structures, Historic Architecture, Architectural Details, Historic Scenic Streetscapes, Mountain and Valley Viewscapes, and Land Use Patterns, Including Streetscapes
3. Ensure that new buildings, and repairs or alterations to existing buildings, do not detract from the historic, residential appearance of the Village.”

The site is located in close proximity to several important historical buildings identified in the Village Plan that are listed on the National Register of Historic Places, including the Mark Skinner Library at the intersection West Road and Main Street which was constructed in 1897, the Equinox Hotel at 3567 Main Street which was constructed in 1767, the First Congressional Church at 3624 Main Street which was constructed in 1871, and the Bennington County Courthouse at the intersection of Union and Main Streets which was built in 1822.

The proposed Facility would not be in harmony with its surroundings or fit the context within which it would be located and would detract from the historic streetscape and adversely impact the aesthetics of these important historical structures.

- B. The Applicant includes the following misleading and false statements in its Narrative:

*“Furthermore, there is an existing C-RAN facility located at 4169 Main Street, directly adjacent to two historic sites: Orvis and the Orvis School house. This Project will be sited farther away from the closest historic site, the Mark Skinner Library, than the existing C-RAN facility adjacent to Orvis and the Orvis School House. Additionally, the Project will be visually shielded from southern views by existing foliage, while no similar screening occurs for the existing C-RAN. For these reasons, AT&T expects to receive a concurrence from the Division that the Project will result in no adverse effect for purposes of Section 106 and will supplement this petition with the results of such review.”*

- C. In response to the above Narrative:

The proposed project is significantly closer to a historic site than the existing C-RAN facility located at 4169 Main Street, the Orvis Fly Fishing School, across from the Orvis Flagship Store, neither of which are historic sites. The closest relevant historic site is the Mark Skinner Library, now the Silver Fork. The proposed Project, to be located just north of the Library, next to 3749 Main Street, would be 0.4 miles closer to the Mark Skinner Library than the 4169 Main Street facility. Further, unlike the proposed Project, the existing 4169 Main Street C-RAN facility lies outside the Historic Core Overlay and is in a different zoning district than the proposed Project. Finally, the proposed Project would have no material visual shielding by foliage, as can be seen in the photos on page 4 of their Narrative provided by the Applicant.

- D. The proposed site is located in a “Special Village Corridor Overlay” in the Village Land Use Ordinance, which was established to ensure land development undertaken along public and through streets in the Village will protect and reflect the historic and scenic character of the Village by maintaining the primarily late 19th and early 20th Century appearance.

- E. As evidenced, the photos included on Exhibits ,page 6 of the Narrative provided by the Applicant, the proposed design includes a materially taller pole with significant modifications (see photo 1, p6), including modern communications equipment to be installed on top of a new utility pole and an added utility cabinet mounted at 11 feet off the ground thus being quite visible to pedestrians and motor vehicles. Contrary to claims made by the Applicant, these features would not be screened by foliage and would significantly harm the viewscape of the surrounding ridgelines and nearby historic sites.
- F. The proposed site is in the Mixed Use 1 (“MU1”) district of the Village in which district utility cabinets are expressly prohibited by the Village Land Use Ordinance, Section 5.2, pg. 46, and Table 5-2, pg. 57.

### III. THE VILLAGE PLAN of DEVELOPMENT

#### *Scenic Roads*

*“The road pattern and streetscape, in and of itself, is a fundamental part of Village history and its aesthetic qualities. In the heart of the Village the relationship of the tree canopy, street lighting, marble walks, and tiers of grass strips, walks, and yards, form a unique bond of aesthetic qualities, which must be preserved....”*

- A. The proposed pole to be replaced is incorrectly characterized in the application as a “utility” pole when in fact it is a light pole.(see photo 1, p6) The Village has taken great care to ensure utility poles and lines have been routed away from view of the Main Street corridor so as not to negatively impact the aesthetics in the Historic Core Overlay area. Furthermore, the Village plans to replace the existing light pole with a more traditional light pole (see photo 2, p6) once Village beautification funds allow. The Applicant’s Project would impair the Village’s ability to pursue this improvement in the future.
- B. The Proposal cites expansion of broadband access to Village for home-based employment / telecommuting as a primary benefit provided by this project. The Village already has strong broadband coverage per Vermont Department of Public Service<sup>3</sup> with upload and download speeds that are more than sufficient for telecommuting per FCC Speed Guide<sup>4</sup>. We believe that the claimed expansion of broadband access is groundless or superfluous.
- C. The Proposal cites enhancement of the FirstNet network for first responders as a key benefit of project. However, the Firstnet.com website shows a map<sup>5</sup> that indicates full coverage of the Manchester area currently exists; accordingly, the claim appears to be superfluous.
- D. The Proposal states that there are no existing telecommunications facilities or support structures in the area that could be upgraded to allow AT&T to satisfy its objectives. Insufficient support or explanation was provided for this claim, including details on other technology or location options evaluated or considered. The Village is supportive of improvements in telecommunication and data transfer; we would welcome alternative site locations that would better support all of the Village Plan of Development.

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<sup>3</sup> <https://experience.arcgis.com/experience/27e90a33447042d0bbf4321acc253673>

<sup>4</sup> [https://www.fcc.gov/sites/default/files/broadband\\_speed\\_guide.pdf](https://www.fcc.gov/sites/default/files/broadband_speed_guide.pdf)

<sup>5</sup> <https://www.firstnet.com/coverage.html>

The Village Planning Commission requests that the PUC deny the petition for a CPG with regards to the proposed Facility because it fails to comply with the Village Plan of Development and would violate multiple provisions of the Village Land Use Regulations. We hope that the PUC will encourage the applicants to research other alternatives.

Respectfully,



Rich Heilemann, Chairperson  
Village of Manchester Planning Commission

CC:

Town of Manchester; Planning Commission & Town Manager  
Scott Murphy

Downs, Rachlin & Martin  
Emily A. Garrett, Esq.

Vermont Public Utilities Commission

Attachments:  
EXHIBITS

## EXHIBITS



South corner of 3749 Main Street

1. Simulation of AT&T proposed utility pole. Height includes facilities mounted on top of the pole. The light pole, noted in II. C. is visible on the west side of 7A. The pole was installed by GMP at the request of the Village for public safety. The Village leases the light pole from GMP

The street scape as viewed within the Historic District Core does not have utility poles. Every effort has been made to position utility poles behind buildings and away from the street scape.



2. View north towards the historic Main Street Corridor; Route 7A

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## EXHIBITS (cont.)

Discussions have been ongoing to bury utility poles that are viewed in the photograph 3 in the direction away from the Historic Core in the future.



3. View north on Historic 7A